

**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF GEORGIA**

IN RE:)
)
KENNETH R. PIERCE,) **CHAPTER 12**
) **CASE NO. 17-60154-EJC**
Debtor.)

APPLICATION FOR INTERIM COMPENSATION

COMES NOW the undersigned counsel for the above Debtor and respectfully requests this Court for an allowance of interim compensation and reimbursement pursuant to 11 U.S.C. §§ 330 and 331 as follows:

1.

Debtor Kenneth R. Pierce (“Debtor”) filed this Chapter 12 Bankruptcy proceeding on April 3, 2017.

2.

Continuously throughout this case H. LEHMAN FRANKLIN, P.C. has served as counsel for the Debtor.

3.

H. LEHMAN FRANKLIN, P.C. has rendered professional services on behalf of the Debtor. Such services have included, but are not limited to, the following:

- (a) advice and consultation with the Debtor;
- (b) review of motions and other documents filed with the Court;
- (c) representation of the Debtor at hearings;
- (d) conferences with representatives of creditors and other interested parties;
- (e) representation of the Debtor in contested matters before the Bankruptcy Court;
- (f) preparation of various motions and orders;
- (g) representation in two adversary proceedings.

4.

H. LEHMAN FRANKLIN, P.C. has provided services necessary to the preservation and protection of the assets of the estate.

5.

H. LEHMAN FRANKLIN, P.C. now seeks compensation in the amount of \$26,052.75.

This amount is for professional services rendered from April 3, 2017 through March 12, 2018. A complete description of the services performed by H. LEHMAN FRANKLIN, P.C. on a daily basis, from April 3, 2017 through March 12, 2018, including the amount of time devoted to such services by the lawyers and paralegals performing the services, is set forth in a statement which is attached here to as Exhibit A. In addition, H. LEHMAN FRANKLIN, P.C. has disbursed the sum of \$917.36 through March 12, 2018, which it has incurred as actual, necessary expenses in the performance of services on behalf of the Debtor, which are set forth in Exhibit A.

6.

The undersigned's rates are the normal and customary rates of compensation in bankruptcy related matters in which similar services are rendered in matters of comparable nature, given due consideration to the nature of the services rendered, the size of the case, the legal complexities encountered, the experience and competency of the undersigned in this specialized field of law, the time devoted, and the result achieved on behalf of the Debtor.

7.

H. LEHMAN FRANKLIN, P.C. is currently holding a pre-petition retainer of \$10,000.00 in its trust account and would like to apply that sum to the attorney's fees and expenses as may be approved by this Court.

WHEREFORE, the undersigned respectfully requests that this Court authorize compensation to H. LEHMAN FRANKLIN, P.C. in the amount of \$26,052.75 for attorney's fees, and \$917.36 for expenses and authorize H. LEHMAN FRANKLIN, P.C. to apply the funds currently held in trust toward approved fees and expenses.

Respectfully submitted this 14th day of March, 2018.

H. LEHMAN FRANKLIN, P.C.

/s/ Kimberly S. Ward
Kimberly S. Ward
Georgia Bar No. 682042
Attorney for Debtor

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CERTIFICATE OF SERVICE

This is to certify that I have this date electronically served the foregoing Application for Compensation upon James C. Overstreet, Jr., Chapter 12 Trustee, and Matthew E. Mills, Assistant United States Trustee.

This 14th day of March, 2018.

H. LEHMAN FRANKLIN, P.C.

/s/ Kimberly S. Ward
Kimberly S. Ward
Georgia Bar No. 682042
Attorney for Debtor

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